

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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AVRAHAM GOLDSTEIN; MICHAEL GOLDSTEIN;  
FRIMETTE KASS-SHRAIBMAN; MITCHELL  
LANGBERT; JEFFREY LAX; MARIA PAGANO,

Plaintiffs,

-against-

PROFESSIONAL STAFF CONGRESS/CUNY; CITY  
UNIVERSITY OF NEW YORK; JOHN WIRENIUS, in his  
official capacity as Chairperson of the New York Public  
Employee Relations Board; ROSEMARY A. TOWNLEY, in  
her official capacity as Member of the New York Public  
Employee Relations Board; ANTHONY ZUMBOLO, in his  
official capacity as Member of the New York Public  
Employee Relations Board; CITY OF NEW YORK;  
THOMAS P. DINAPOLI, in his official capacity as New  
York State Comptroller,

Defendants.

**NOTICE OF RULE 68 OFFER  
OF JUDGMENT**  
22 Civ. 00321 (PAE)

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PLEASE TAKE NOTICE that pursuant to Rule 68 of the Federal Rules of Civil Procedure, on May 6, 2022, Plaintiff Avraham Goldstein hereby accepted the Offer of Judgment, dated April 22, 2022, offered by Defendant the City of New York, in the amount of two hundred and twenty-three dollars and thirty-five cents (\$223.35), plus reasonable attorneys' fees, expenses, and costs accrued up to April 22, 2022, as determined by this Court under applicable law if necessary, for all claims that have been, or could have been, asserted in the Complaint by Plaintiff Avraham Goldstein in the above-captioned matter, to the date of this offer.

The following documents are annexed hereto:

(A) Exhibit "A" is a copy of the Affirmation of Service regarding Defendant the City of New York's service of its Rule 68 Offer of Judgment;

(B) Exhibit “B” is a copy of an email dated May 6, 2022, from Nathan McGrath to the undersigned accepting Defendant the City of New York’s Rule 68 Offer of Judgement; and

(C) Exhibit “C” is a copy of the Rule 68 Officer of Judgment served by Defendant City of New York on Plaintiff Avraham Goldstein on April 22, 2022.

Dated: New York, New York  
October 7, 2022

Hon. Sylvia O. Hinds-Radix  
Corporation Counsel of the  
City of New York  
Attorney for Defendant City of New York  
100 Church Street  
New York, New York 10007  
By: \_\_\_\_\_/s/  
John F. Walpole  
Assistant Corporation Counsel

cc: All Counsel (via ECF)